

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Part 97 of the Commission's)	
Amateur Radio Service Rules to Eliminate)	RM - 10786
Morse Code Proficiency Testing Requirements)	
For All Classes of Amateur Licenses)	
)	
To: The Commission)	

Comments Of Jon M. Miller, MD –W5TSR

With the advancement of technology and specifically with the development of digital transmission methods, all rationale for requiring Morse proficiency of amateur radio operators has become an anachronism. The closest analogy in my opinion is a license requirement that all operators of motor vehicles first demonstrate their proficiency in the operation of horse-drawn conveyances. The Morse requirement has been debated, to my knowledge, for 20 years and there is simply no reason to continue Morse proficiency requirements. The fact that ITU Radio Regulations no longer require Morse proficiency and that much of the rest of the world has already dropped Morse requirements demonstrates that continued Morse testing is an unnecessary and restrictive component to the progress of amateur radio in the United States. I respectfully ask the commission to view the NCI petition favorably and expeditiously. I would also request that the ruling not be combined with other, essentially unrelated, issues such as operator privileges, band segmentation, etc. but be viewed on its own merit. It would also be in everyone's best interest if the Commission amend Part 97 rules by expedited order as the issue has been in continuous debate for two decades.

Respectfully submitted,

Jon M. Miller, MD, PhD – W5TSR
2000 Warrington Way, Suite 160, Louisville, KY 40222
Email – jonmiller@pol.net